

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)

Amendment to Part 61 of)
the Commission's Rules Requiring)
Metric Conversion of Tariff)
Publications and Supporting)
Information)

CC Docket No. 93-55

COMMENTS OF NEW YORK TELEPHONE COMPANY
AND NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

New York Telephone Company and New England Telephone and Telegraph Company (the "NYNEX Telephone Companies" or "NTCs") submit the following comments in response to the Commission's Notice of Proposed Rulemaking ("Notice") in the above-referenced docket.

I. INTRODUCTION

The Commission proposes to amend Part 61 of its rules¹ to require carriers to incorporate metric unit measurements in tariffs and supporting documentation.²

¹ 47 C.F.R., Part 61.37.

² The proposed amendment is designed to advance the goal of the Metric Conversion Act of 1975 (15 U.S.C. § 205 et. seq.) (the "Act") which establishes the metric system as the preferred system of weights and measures for United States trade and commerce, See Notice at ¶¶ 1-3.

Specifically, the Commission's proposed amendment would require individual carriers to "express measurement-sensitive information in a tariff publication in metric units" through the use of one of three proposed options.³ In addition, the Commission's proposal requires a carrier to remain consistent in its conversion approach and enables customers to expect a

~~uniform method of conversion from a particular carrier~~

Each of the methods proposed by the Commission would advance the intent of Congress in establishing a national metric policy under the Act and, as such, if used consistently by carriers, any one of the options complies with the Act. Under these circumstances, the NTCs support the Commission's proposal to permit a carrier to choose the conversion method to be used to meet its obligation. The Commission's proposal properly balances the national goal of introducing a metric system of measurement in tariff filings and conversions and avoiding unnecessary burdens on carriers that could result from the conversion process.

II. THE COMMISSION PROPOSAL TO PERMIT CARRIERS TO SELECT THE METRIC CONVERSION THEY WILL EMPLOY IS SOUND AND SHOULD BE ADOPTED

Each of the three options proposed by the Commission would comply with the Act. The Commission's proposal to permit carriers to select which one of the three options they would employ to meet their metric obligations would afford carriers the opportunity to determine which particular option is least burdensome for them and equally beneficial for their respective customers.

The Commission should not assume, as it does, that because a carrier is larger, its burden to comply with any conversion method within a two-year period is comparatively less than a smaller carrier.⁷ The implication that Tier 1 carriers have the resources to more easily institute metric conversion is

⁷ See Notice at ¶¶ 10 and 16.

not necessarily correct. In fact, the NTCs, like many larger carriers (and unlike numerous small carriers), operate before several state Commissions, none of which (in the NTCs' region) presently require metric unit designation or conversion tables.

~~Options 2 and 3 would impose significant burdens on the NTCs~~

concern is misplaced. Under the Commission's proposal, customers will receive a uniform method of conversion from a particular carrier and, therefore, are unlikely to be confused. Further, carriers will be the first to hear from customers if the metric conversion method chosen is confusing. Carriers can then make requisite adjustments (on a uniform basis) keeping pace with their customers' acceptance and understanding of the metric system itself.

III. CONCLUSION

The Commission proposal to permit carriers to select one of three metric conversion options meets the needs and objectives of the Act, customers and carriers. It should be adopted without modification.

Respectfully submitted,

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and
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